

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

DERRICK EVANS,

Plaintiff,

v.

THE HUFFINGTONPOST.COM, INC. and
ASHLEY FEINBERG,

Defendants.

Civil Action No.: 1:19-CV-00536-HSO-JSG

**DECLARATION OF ASHLEY FEINBERG IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, Ashley Feinberg, declare the following, pursuant to 28 U.S.C. § 1746:

1. I submit this Declaration in support of my motion to dismiss this action for lack of personal jurisdiction. This Declaration is based on personal knowledge, and I am fully competent to testify concerning the matters set forth herein.

2. I am a journalist and senior reporter for Slate Magazine in New York, New York. From October 2017 until May 2019, I worked as a senior reporter for TheHuffingtonPost.com, Inc. ("HuffPost"), which is also located in New York City, where I have resided since 2012.

3. I have no personal or professional connection to the State of Mississippi. I have never lived, attended school, owned real property or bank accounts, or conducted business in Mississippi. I have never traveled to Mississippi on business or vacation. I have never advertised, sold or marketed any goods or services to any Mississippi resident or company.

**EXHIBIT
B**


4. This suit involves a claim of defamation pertaining to an article I wrote for HuffPost, entitled “Former Student: Brett Kavanaugh’s Prep School Party Scene Was ‘Free-For-All’” (the “Article”), which was published online on September 20, 2018.

5. The focus of the Article was the social environment at Georgetown Preparatory School, located in North Bethesda, Maryland, during the period in which Supreme Court Justice Brett Kavanaugh attended the school. Upon information and belief, Plaintiff Derrick Evans also attended Georgetown Preparatory School in the early 1980’s.

6. Mr. Evans’s claim of defamation involves a statement in the Article concerning events that occurred in Florida, in 1984. The Article did not pertain to or mention Mississippi in any way, and in researching and writing the Article, I did not travel to or contact any source who resided in Mississippi. To the best of my knowledge, no other staff member at HuffPost who worked on the Article prior to its publication, traveled to or contacted any source who resided in Mississippi in connection with the Article. In researching and writing the Article in September 2018, I was not aware of the state in which Mr. Evans then resided. Even today, I do not possess knowledge of the state of Mr. Evans’s residence, other than what is alleged in the Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15 day of October, 2019



ASHLEY FEINBERG